

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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AVERIL C. MORRISON, DELISA WILLIAMS, :
JANENNE GONZALEZ, DELROY DANVERS, :
GARFIELD DANVERS, Individually and on :
behalf of all others similarly situated,

Civil Action No. 1:12-cv-00301-FB-RER

Plaintiffs,

-against-

STIPULATION

INTERNATIONAL UNION OF OPERATING
ENGINEERS LOCAL 14-14B, AFL-CIO, BAY
CRANE SERVICE INC., DCM ERECTORS,
INC., DRAGADOS CONSTRUCTION USA,
INC., DRAGADOS USA, INC., EL SOL
CONTRACTING AND CONSTRUCTION
CORPORATION, FOREST CITY
COMMERCIAL CONSTRUCTION CO., INC.,
FOREST CITY RATNER COMPANIES, LLC,
GOTHAM CONSTRUCTION COMPANY, LLC,
HALMAR CONSTRUCTION CORP., JUDLAU
CONTRACTING, INC., JUDLAU
ENTERPRISES, LLC, LEND LEASE (US)
CONSTRUCTION LMB INC., MONADNOCK
CONSTRUCTION, INC., SHIAVONE
CONSTRUCTION CO, LLC, SKANSKA USA
INC., SKANSKA INC., SOLERA
CONSTRUCTION INC., SORBARA
CONSTRUCTION CORP., TISHMAN
CONSTRUCTION CORPORATION OF
MANHATTAN, TISHMAN CONSTRUCTION
CORPORATION OF NEW YORK, TISHMAN
CONSTRUCTION CORPORATION, TURNER
CONSTRUCTION COMPANY, YONKERS
CONTRACTING COMPANY, INC.,

Defendants.

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IT IS HEREBY STIPULATED AND AGREED by and between the parties,
through their respective counsel, and subject to the approval of the Court, that:

1. Counsel for both parties have spoken numerous times and are actively pursuing settlement. As such, the parties mutually agree that additional time to confer would be beneficial and aid in coming to an agreement in order to avoid the possibly unnecessary cost of answering or otherwise moving in response to the Amended Complaint

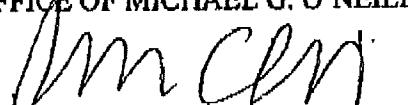
2. The parties hereby stipulate and respectfully request the Defendants' time to answer, object or otherwise respond to the Amended Complaint shall be extended two weeks to October 12, 2012. This stipulation is without waiver or prejudice to any defenses available to Defendants which are hereby expressly preserved.

3. Signatures by facsimile shall be acceptable for purposes of this stipulation.

Dated: September ___, 2012

Respectfully submitted,

LAW OFFICE OF MICHAEL G. O'NEILL

By: 
Michael G. O'Neill, Esq.

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Attorneys for Plaintiffs

Respectfully submitted,

PROSKAUER ROSE LLP

By: 
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Attorneys for Defendants

Forest City Ratner Companies, LLC
Forest City Commercial Construction Co.,
Inc. and Forest City Enterprises, Inc.

SO ORDERED this ___ day of
_____, 2012.

Honorable Frederic Block
United States District Judge